

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF Southern **RECEIVED**
DIVISION

2006 JUL -5 P 12:51

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

1:06 CV 598-WKW-CSC

Linda Williams)
3538 Lake Oakridge Dr.)
Enterprise, AL 36330)
Plaintiff)

Enterprise City School District)
502 E. Watts Str.)
Enterprise, AL 36331-1790)
Defendant(s))

COMPLAINT

1. Plaintiff resides at 3538 Lake Oakridge Dr. Enterprise, AL
2. Defendant(s)' name(s) Enterprise City Schools

Location of principal office(s) of the named defendant(s) 502 East Watts St.
Enterprise, AL 36331-1790

Nature of defendant(s)' business School System

Approximate number of individuals employed by defendant(s) 450

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 2000e-5(g).

4. The acts complained of in this suit concern:

1. ☐ Failure to employ me.
2. ☒ Termination of my employment.
3. ☐ Failure to promote me.
4. ☐ Other acts as specified below: _____

5. Plaintiff is:

- A. ☐ Presently employed by the defendant.
☒ Not presently employed by the defendant. The dates of employment were August 1999 - August 2005. Employment was terminated because:

- (1) ☒ Plaintiff was discharged.
 (2) ☐ Plaintiff was laid off.
 (3) ☐ Plaintiff left job voluntarily.

6. Defendant(s)' conduct is discriminatory with respect to the following:

- A. ☐ My race.
 B. ☐ My religion.
 C. ☐ My sex.
 D. ☐ My national origin.
 E. ☒ Other, as specified below: Disability

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is(are) Jackie DuBose Principal

8. The alleged discrimination occurred on or about 11-2003 thru 5-2005.

9. The nature of my complaint, i.e., the manner in which the individual(s) named above discriminated against me in terms of the conditions of my employment, is as follows: _____

The principal criticized me for activities that were considered satisfactory for other teachers. My disability was not diagnosed for more than a year of seeking medical attention. The disease was in a serious state by the time specialists diagnosed the illness.

10. The alleged illegal activity took place at Rucker Blvd. Elementary School

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s)' alleged discriminatory conduct on or about Dismissal. I have attached a copy of the Notice-of-Right-to-Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on April 11, 2006
12. I seek the following relief:
- A. ☒ Recovery of back pay.
- B. ☒ Reinstatement to my former job,
and any other relief as may be appropriate, including injunctive orders, damages, costs,
and attorney's fees.

Date: July 5, 2006

Linda Williams
Signature of Plaintiff
3538 Lake Oakridge Dr.
Enterprise, AL 36338
334 343-1979
Address & Telephone Number of Plaintiff